

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 08 CR 235
)	
MIGUEL OCON,)	Honorable Judge Gottschall
)	
Defendant.)	

MOTION FOR INSPECTION OF ELECTRONIC SURVEILLANCE MATERIALS

Defendant, MIGUEL OCON, by and through his attorney, RACHEL L. ZEBIO, hereby moves this Honorable Court for an Order directing the government to disclose and to certify the extent of the electronic surveillance, including either wire tapping and interceptions of telephone conversations, or any form of surveillance by radio transmissions or receptions, or any other form of electronic surveillance or detection used by the government in any phase of its investigation of the Defendant. Defendant further requests that the government be required to disclose the same to the Defendant and to make available to him all matters pertaining thereto (including applications for any order, the logs of any government agent or employee or other persons conducting such surveillance, copies of recordings made under the surveillance, copies of the transcripts of such recordings, and any and all returns of inventories made by the government respecting such surveillance). This disclosure should in addition include all such items which are of record and all matters, whether or not of record, which were within the possession, custody or control of the Government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the Government.

Respectfully submitted,

/s/
Rachel L. Zebio

Rachel L. Zebio
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(312) 782-2770

UNITED STATES DISTRICT COURT

**NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
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Plaintiff,)	
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v.)	
)	No. 08 CR 235
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)	
Defendant.)	Honorable Judge Gottschall

NOTICE OF FILING

**TO: AUSA Nathalina Hudson
U.S. Attorney's Office
219 S. Dearborn, 5th Floor
Chicago, IL 60604**

PLEASE TAKE NOTICE that on June 9, 2008, I filed electronically with the clerk of the United States District Court for the Northern District of Illinois, Eastern Division, the attached, **Motion for Inspection of Electronic Surveillance Materials**. True and correct copies of each is attached hereto and hereby served upon you.

Respectfully Submitted,

_____/s/_____
Rachel L. Zebio

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Certificate of Service

I, Rachel L. Zebio, an attorney certify that the attached copy of the document stated above was delivered, electronically, to A.U.S.A. Nathalina Hudson, 219 S. Dearborn, Suite #500, Chicago, IL 60604, and hand delivered to the Honorable Judge Gottschall, 219 S. Dearborn, Room 2356, Chicago, IL 60604 on this 9th day of June, 2008.

_____/s/_____
Rachel L. Zebio

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